

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION

**CHRISTOPHER HUEY, JUSTIN CHARLTON,  
GARY LOONEY and GEORGE LUCAS,  
Each Individually and on Behalf of  
All Others Similarly Situated**

**PLAINTIFFS**

vs.

No. 4:20-cv-685-LPR

**TRINITY PROPERTY MANAGEMENT, LLC,**

**DEFENDANT**

**BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR  
LIMITED RECONSIDERATION OF ORDER, ECF NO. 69**

On June 1, 2022, Plaintiffs filed a Motion for Costs and Attorneys' Fees. See ECF Nos. 57 & 58. On March 29, 2023, this Court entered an Order granting in part and denying in part Plaintiffs' Motion, awarding Plaintiffs' counsel \$8,807.50 in attorneys' fees and \$880.77 in costs. See ECF No. 69. In making its ruling, the Court disregarded 3.8 hours of attorney April Rhéaume's billed time as well as 0.5 hours of attorney Samuel Brown's billed time due to the fact that the descriptions given for these entries were redacted as attorney-client privileged information. See *id.* at pp. 11-12. The Court also struck 11.7 hours of paralegal time due to redacted descriptions. See *id.* at p. 17.

The Court provided that Plaintiffs' Counsel could file a Motion for Reconsideration for their request related to client communications, filing the relevant time entries *ex parte* and under seal. See *Id.* Consistent with the Court's Order, a copy of Plaintiffs' counsel's relevant unredacted time entries are being provided to the Court *ex parte* and under seal concurrently with the filing of this Motion. The time records demonstrate that the majority of client communications relate to settlement, status

updates, discovery, and requests for information. As demonstrated by the submitted time entries, Plaintiffs' counsel seeks compensation for an additional 16.3 hours of billed fees relevant to client communications, equaling \$1,832.50.

Including all the hours sought in this Motion and Brief, Plaintiffs' counsel would receive compensation for less than 20 hours of attorney and paralegal time for client communications in this case. In a case spanning 2 years involving a certified class, 13 ultimate Plaintiffs, discovery propounded to each one of those Plaintiffs, and several other potential Plaintiffs, this amount is eminently reasonable. Each billing entry provided involves valuable communications between Plaintiffs and their attorneys.

### **CONCLUSION**

Plaintiffs respectfully request that this Court enter an Order modifying its previous Order (ECF No. 69) to award Plaintiffs' Counsel an additional \$1,832.50, and for all other relief to which Plaintiffs are entitled.

Respectfully submitted,

**CHRISTOPHER HUEY, JUSTIN CHARLTON,  
GARY LOONEY and GEORGE LUCAS,  
PLAINTIFFS**

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